## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

AMAZON.COM, INC. and AMAZON DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR COMMERCIAL PARTNERS, et al.,

Defendants.

800 HOYT LLC,

Intervening Interpleader Plaintiff / Intervening Interpleader Counter-Defendant,

v.

BRIAN WATSON, WDC HOLDINGS, LLC, and BW HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON DATA SERVICES, INC.,

Interpleader Defendants / Interpleader Counter-Plaintiffs.

CASE NO. 1:20-CV-484-RDA-IDD

## NOTICE OF FILING OF MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Rule 5(C), Defendants Brian Watson ("Watson"); WDC Holdings LLC, dba Northstar Commercial Partners ("Northstar"); Sterling NCP FF, LLC; Manassas NCP FF, LLC; and NSIPI Administrative Manager (collectively, the "Watson Defendants") hereby respectfully submit this notice of filing a motion for leave to file under seal the Reply in Support of the Watson Defendants' Motion for Summary Judgment and Exhibit 2 to the Declaration of

George R. Calhoun in support thereof. Parties and non-parties may submit memoranda in support

of or in opposition to the motion within seven (7) days after the filing of the motion to seal and

may designate all or part of such memoranda as confidential. Any information designated as

confidential in a supporting or opposing memorandum will be treated as sealed pending a

determination by the Court on the motion to seal. Any person objecting to the motion must file an

objection with the Clerk within seven (7) days after the filing of the motion to seal, and if no

objection is filed in a timely manner, the Court may treat the motion as uncontested.

Moreover, because the material sought to be sealed describes and includes documents

designated as "Confidential" by Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.

(collectively, "Amazon"), they are hereby notified of their obligation to file a response to this

motion complying with Local Civil Rule 5(C)(2), (3), and (4), along with a proposed order,

pursuant to Local Rule 5(C).

Dated: February 8, 2023

Respectfully submitted,

/s/ Jeffrey R. Hamlin

Jeffrey R. Hamlin (VA Bar No. 46932)

George R. Calhoun (pro hac vice)

James Trusty (pro hac vice)

IFRAH PLLC

1717 Pennsylvania Avenue NW, Suite 650

Washington, DC 20006

Telephone: (202) 524-4140

Facsimile: (202) 524-4141

jhamlin@ifrahlaw.com

george@ifrahlaw.com

itrusty@ifrahlaw.com

Stanley L. Garnett (pro hac vice)

Amanda K. Houseal (pro hac vice)

Sara R. Bodner (pro hac vice)

Leah M. Regan-Smith (pro hac vice)

Brownstein Hyatt Farber Schreck, LLP

2

410 17<sup>th</sup> Street, Suite 2200 Denver, CO 80202 Telephone: (303) 223-1100 Facsimile: (303) 223-1111 sgarnett@bhfs.com ahouseal@bhfs.com sbodner@bhfs.com lregansmith@bhfs.com

Counsel for WDC Holdings LLC, Brian Watson, Sterling NCP FF, LLC, Manassas NCP FF, LLC, NSIPI Administrative Manager, and BW Holdings LLC